Commonwealth of Kentucky Before the Public Service Commission

FEB 0 9 2005

PUBLIC SERVICE SOMMISSION Case No. 2005-00052

In the Matter of: NORTHERN KENTUCKY WATER DISTRICT)

FOR A CPCN FOR CONSTRUCTION OF

U.S. 27 PUMP STATION EXPANSION

ATTORNEY GENERAL'S MOTION TO INTERVENE

)

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, pursuant to KRS 367.150(8), and moves to intervene in the above-styled proceeding. The Attorney General requests that he be permitted to intervene as a party to the fullest extent permitted by law in order to execute his statutory duties pursuant to KRS 367.150(8).

Respectfully submitted,

GREGORY D. STUMBO ATTORNEY GENERAL

Daw Ell Spanowd

David Edward Spenard Assistant Attorney General 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204 502 696-5457

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of this Motion to Intervene

were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public

Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it

was served by mailing a true and correct of the same, first class postage prepaid, to John

N. Hughes, 124 West Todd Street, Frankfort, Kentucky 40601; Ronald J. Barrow,

Northern Kentucky Water District, P. O. Box 200, Cold Spring, Kentucky 41076; and

Charles H. Pangburn III, Hemmer, Spoor, Pangburn, DeFrank & Kasson, PLLC, 250

Grandview Drive, Suite 200, Ft. Mitchell, Kentucky 41017, all on this 9th day of February

2005.

Dani Edward Spermal Assistant Attorney General